

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

Judge: Robert J. White

Magistrate Judge: Mark J. Dinsmore

JOINT REPORT ON THE STATUS OF DISCOVERY

Pursuant to this Court’s June 24, 2025 Order, ECF No. 29, Tiffany Lewis (“Plaintiff”) and Register.com, Inc.¹ (“Defendant”) (jointly, the “Parties”) submit this Joint Report on the Status of Discovery. The information provided herein is intended to supplement the Status Report submitted by the Parties on July 25, 2025.

Joint Report on the Status of Discovery

1. A detailed description of all discovery completed to date.
 - Following the 26(f) conference, the Plaintiff provided her First Set of Discovery to the Defendant on June 12, 2025.
 - Pursuant to an agreed upon thirty-day extension, Defendant provided its First Set of Discovery to Plaintiff on August 4, 2025.
 - The Parties have both provided initial disclosures.
 - The Parties have both filed their Preliminary Witness and Exhibit Lists.
 - On August 12, 2025, Defendant provided its Responses to Plaintiff’s First Set of Discovery and is supplementing its production of records and documents on a rolling basis.

¹ On July 25, 2025, Register.com, Inc., merged with Network Solutions, LLC. For the sake of clarity and consistency with the current case caption, Defendant is referred to herein simply as “Register” or the “Company”. A Motion for Substitution of Party pursuant to Fed. R. Civ. P. 25 is forthcoming.

- On August 20, 2025, the Parties conferred regarding Defendant's Discovery Responses.
- Plaintiff has provided, and Defendant has responded to, Plaintiff's Statement of Special Damages.
- On September 17, 2025 the Plaintiff provided her responses to the Defendant's discovery.

2. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.

- No later than October 3, 2025, Defendant will produce the data responsive to Plaintiff's Requests for Production numbers 6-11, in accordance with the Court's Order on Plaintiff's Motion to Compel (Dkt. 48). The Plaintiff's expert will then analyze that data in advance of the parties' October 21, 2025 mediation.
- Neither party has scheduled any depositions.

3. A detailed description of any discovery disputes presently pending, including the status of the resolution of the dispute and the identity of the counsel responsible for resolving the dispute.

- None

4. A detailed description of all discovery that is planned to be completed within the 28-day period following the report, including the identity of the counsel responsible for completing such discovery.

- The parties intend to request a stay of 30 days of any outstanding deadlines while they mediate this matter, including the Plaintiff's Opposition to the Defendant's Motion to Strike, but that does not include compliance with the Order discussed above.
- Counsel for Defendant, Abbey Block and A. Jeff Ifrah, will provide discovery responsive to Plaintiff's Requests for Production numbers 6-11 in accordance with the Court's Order on Plaintiff's Motion to Compel (Dkt. 49).

5. A description of all known discovery remaining to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

- Aside from the items notated above, Plaintiff's future discovery will include a Fed. R. Civ. P. 30(b)(6) Notice and expert report related to identification of putative class members based on the Defendant's discovery responses and deposition.

- Aside from the items noted above, Defendant's future discovery efforts are likely to hinge on the document production and discovery responses received.
- The completion of further discovery will also likely hinge on the parties' ability to successfully mediate this dispute.

6. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

- None at this time.

Dated: September 22, 2025

/s/ Anthony I. Paronich
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of September 2025, I filed the foregoing with the Court's electronic filing system, which will automatically provide notice to all counsel of record.

/s/ Anthony I. Paronich
Anthony I. Paronich